

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CA #: 03 CV 12463 RGS

GREAT NORTHERN INSURANCE CO.  
as subrogee of PHYLLIS MACNEIL,  
1000 Pillsbury Center  
Minneapolis, MN 55402  
Plaintiff

v.

INTERCITY ALARMS, INC.

20 North Main Street  
Yarmouth, MA 02664  
Defendant/Third Party Plaintiff,

v.

JOHN VOSE,  
Third Party Defendant

**Defendant's Proposed Jury Verdict**

Answer the following questions:

1. Was the defendant Intercity Alarms, Inc. negligent?

\_\_\_\_\_Yes \_\_\_\_\_No.

If your answer to question 1. above was yes, please continue to the next question.

1. Was the defendant Intercity Alarms, Inc.'s negligence the proximate cause of the plaintiff's losses.

\_\_\_\_\_Yes \_\_\_\_\_No.

If your answer to question 2 above was yes, please continue to the next question.

2. As a result of the negligence of the defendant Intercity Alarms, Inc., did the plaintiff suffer damages?

\_\_\_\_\_Yes \_\_\_\_\_No.

If your answer to question 3. above was yes, please continue to the next question.

3. If the answer to question #3 is in the affirmative, what compensatory damages do you award to the plaintiff for the damage to the real and personal property of the plaintiffs' subrogee, which were proximately caused by the negligence of the defendant(s)

Answer: \$\_\_\_\_\_ (indicate dollar amount)

4. Was the third party defendant John Vose negligent?

\_\_\_\_\_Yes \_\_\_\_\_No.

If your answer to question 6. above was yes, please continue to the next question.

5. Was the third party defendant John Vose's negligence the proximate cause of the plaintiff's losses.

\_\_\_\_\_Yes \_\_\_\_\_No.

If your answer to question 6 above was yes, please continue to the next question.

6. As a result of the negligence of the third party defendant John Vose did the plaintiff suffer damages?

\_\_\_\_\_Yes \_\_\_\_\_No.

If your answer to question 7. above was yes, please continue to the next question.

7. If the answer to questions #7 is in the affirmative, what compensatory damages do you award to the plaintiff for the damage to the real and personal property of the plaintiffs' subrogee, which were proximately caused by the negligence of John Vose?

Answer: \$\_\_\_\_\_ (indicate dollar amount)

---

Foreperson of the Jury